

Robert T. Smith
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Attorney for CNI Enterprises, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
In re	:	Chapter 11 Case No.
	:	
GENERAL MOTORS CORP., et al.,	:	09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**NOTICE OF APPEARANCE AND REQUEST FOR
NOTICE AND SERVICE OF PAPERS**

Pursuant to 11 U.S.C. 1109(b) and Federal Rule of Bankruptcy Procedure 9010(b),
Robert T. Smith appears as attorney for CNI Enterprises, Inc. ("CNI") in these cases.

CNI requests that all notices given or required to be given, all papers served or
required to be served, and all papers filed or required to be filed in these cases be given to
and served upon it electronically or by mail as follows:

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The foregoing request for service includes any notice, pleading, paper, application, motion, petition, claim, statement, plan, order, complaint or demand, whether formal or informal, written or oral, and however transmitted or conveyed, that (i) is required or permitted to be given or served under any provision of the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, or by order of the Court, or (ii) is related to any of the debtors, their property, any property in their possession, custody, or control, or the administration of their bankruptcy cases.

This Notice of Appearance and Request for Notice and Service of Papers (this "Notice") and any other notice, appearance, pleading, filing, or suit is not intended to be, and should not be construed as, (a) a waiver of CNI's right to have final orders in non-core matters entered only after *de novo* review by a United States District Judge, (b) a waiver of CNI's right to trial by jury in any proceeding, case or controversy related to these cases, (c) a waiver of CNI's right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (d) a waiver of any objection by CNI to the jurisdiction of this Court for any purpose other than with respect to this Notice, (e) an election of remedies by CNI, or (f) a waiver by CNI of any other rights, claims, actions, defenses, setoffs, or recoupments, all of which are reserved.

Dated: June 3, 2009

s/ Robert T. Smith

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